

EXHIBIT A

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE FOURTH JUDICIAL CIRCUIT
COUNTY OF DARLINGTON)	Civil Action No.: 2022-CP-16-
)	
Erick Liles,)	
)	
Plaintiff,)	
vs.)	
)	SUMMONS
Steve Goodwin Logging, Inc., Randy)	(Jury trial demanded)
Ray Bailey and Randy Bailey Trucking)	
Co. LLC,)	
)	
Defendants.)	

TO: THE DEFENDANTS ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint in this action, a copy of which is herewith served upon you, upon the subscriber at his offices at 301 Gibson Road, Lexington, South Carolina, within thirty (30) days of the service hereof, and if you fail to answer the complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the complaint.

THE RICK HALL LAW FIRM, LLC

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Lexington, S.C.
 March 9, 2022

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STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE FOURTH JUDICIAL CIRCUIT
COUNTY OF DARLINGTON)	Civil Action No.: 2022-CP-16-
)	
Erick Liles,)	
)	
Plaintiff,)	
vs.)	
)	COMPLAINT
Steve Goodwin Logging, Inc., Randy)	(Jury trial demanded)
Ray Bailey and Randy Bailey Trucking)	
Co. LLC,)	
)	
Defendants.)	

The Plaintiff, complaining against the Defendants above named, would respectfully show to the Court as follows:

PARTIES AND JURISDICTION

1. The Plaintiff, Erick Liles, is a citizen and resident of the State of South Carolina.
2. That the Defendant, Steve Goodwin Logging, Inc. is a corporation organized and existing under and pursuant to the laws of the state of North Carolina.
3. That the Defendant, Randy Bailey Trucking Co., LLC is limited liability company organized and existing under the laws of the State of North Carolina.
4. That the Defendant, Randy Ray Bailey, is, upon information and belief, a citizen and resident of the State of North Carolina and at all times herein mentioned was an agent and servant of the Defendant Steve Goodwin Logging, Inc. and Randy Bailey Truck Co., LLC.
5. That at the time of the collision herein mentioned, the Plaintiff, Erick Liles, was a passenger in the vehicle being driven by Jean Irene Lesperance, Jr., which was a 2017 Hyundai sedan automobile.
6. That the most substantial part of the alleged negligent acts or omissions giving rise to this cause of action occurred in Darlington County, South Carolina.

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7. Therefore, venue lies in Darlington County, South Carolina and within the Court of Common Pleas for Darlington County.

FACTUAL BACKGROUND AND ALLEGATIONS

8. That on or about March 12, 2019, while a passenger in the Lesperance vehicle, the Plaintiff and Lesperance were struck from behind by a 2014 Kenwood tractor-trailer being driven by Randy Ray Bailey, the Defendant herein, who was an agent and servant of the Defendant Steve Goodwin Loggins, Inc., and the Defendant Randy Bailey Trucking Co., LLC.

9. That the Defendant Steve Goodwin Logging, Inc. (Goodwin) and Randy Bailey Trucking Co., LLC (Bailey LLC) are responsible for all injuries and damages sustained to the Plaintiff herein as a result of the doctrine of *respondeat superior*.

10. That on or about March 12, 2019, the Defendant Randy Ray Bailey was operating a 2014 Kenwood tractor-trailer as an agent and servant of Goodwin and Bailey, LLC in a manner that was too fast for conditions, in excess of the speed limit and was following too closely.

11. That the Defendants were willful, wanton, negligent and grossly negligent in the following particulars:

- a. Failing to keep the tractor-trailer driven by the Defendant Bailey under proper control;
- b. In following too closely;
- c. In driving at an excessive rate of speed;
- d. Driving too fast for conditions;
- e. In failing to keep a proper lookout;
- f. and in such other and further particulars as may be uncovered during the course of discovery, and

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all of which were a proximate cause of the injuries and damages sustained by the Plaintiff herein, including traumatic brain injury, post concussive symptoms, mental anguish, low back and neck injuries, pain and suffering, loss of enjoyment of life and medical expenses in excess of \$19,000.

12. That as a direct and proximate result of the collision, the Plaintiff is informed and believes that he is entitled to an award of actual and punitive damages in an amount to be determined by a jury, including damages for the stated medical specials, pain and suffering, both past, present and future, mental anguish, loss of enjoyment of life, future medical expenses and lost wages.

Wherefore, having fully set forth his Complaint herein, the Plaintiff prays for an award of actual and punitive damages in an amount to be determined by a jury, and for the costs of this action.

Respectfully submitted,

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